

Appendix 12

COST ANALYSIS FOR THE PROPOSED CONDITIONAL WAIVER FOR DISCHARGES FROM IRRIGATED LANDS

I. INTRODUCTION

Outlined below is the cost analysis for the Conditional Waiver for Discharges from Irrigated Lands. It addresses both Individual Dischargers and Discharger Groups, and provides information on costs for compliance with the Regional Board's Monitoring and Reporting Programs (MRPs). This analysis includes capital cost estimates for testing the required constituents of concern (COC), state fees, as well as grant funding for agriculture. It does not include the cost for administrative, staffing, reporting, etc. The cost estimate is also compared to cost estimates for Agricultural Waiver programs from two other Regions of the State, Regions 3 and 5.

II. ESTIMATED CAPITAL COST FOR TESTING

The annualized costs for a typical Discharger for testing per sampling site per year is \$4,883. For a Low-Risk Discharger, the cost per site per year over a five-year period is \$2,093. Detailed calculations can be found in the attached Excel spreadsheet (Attachment 1). The costs for this analysis were based on information from private and university laboratories for COCs, and the estimated frequency for typical Dischargers, as well as the assumption the monitoring program will be completed within a 5-year monitoring period.

III. COMPARISON TO OTHER REGIONS

The program costs for typical Group Dischargers in Regions 3 and 5 were also calculated based on a five-year monitoring period. The annual costs for testing per sampling site per year is \$8,920 for Region 3 and \$15,889 for Region 5 (Figure 1). The estimated cost per acre per year was based on the estimated number of monitoring sites in each Region, which may explain the disparities between regions. For the Los Angeles Region, the actual number of monitoring sites is based on the Notice of Intent (NOI) proposed by the Discharger, and the Notice of Applicability issued by the Executive Officer. For Ventura, the estimated number of sampling sites was 30, which included reaches on the 303(d) list where agriculture runoff is denoted as a potential source. For approximately 263,000 acres of cropland and an estimated 30 sampling sites, the acreage per sampling site is 8767 acres. The analytical cost per acre per year is \$0.56/year for a typical Discharger and \$0.24/year for a Low-Risk Discharger. Figure 2 shows the comparison between the estimated cost for R4 and R5 per acre per year.

IV. PROPOSED STATE FEES

The proposed annual fee for waivers for discharges from agricultural land is \$100 per farm plus \$0.50 per acre of land. If a discharger joins a group which manages fee collection and payment, the proposed fee is \$100 per group plus \$0.25 per acre of land. Similar fee schedules will apply to Region 3 and Region 5. The Ambient Water Monitoring (AWM) surcharge does not apply to annual fees for waivers as specified in the California Code of Regulations, Title 23, Division 3, Chapter 9, section 2200(a)(3).

V. AGRICULTURE WATER QUALITY GRANT FUNDING

Discharger Groups may also reduce costs for individual participants by acquiring funding from other sources. Agriculture water quality grants are available for projects which reduce or eliminate Non-Point Source (NPS) pollution from agricultural lands discharged to surface water. The Los Angeles Region will also receive at least \$4 million from the Agriculture Water Quality Grants Program (AWQGP), which provides funding for both monitoring and implementation projects. For more details on the AWQGP please go to the following web site: <http://www.waterboards.ca.gov/funding/awqgp/index.html>.

Figure 1: Estimated Cost per Site per Year for Regions 3,4, and 5

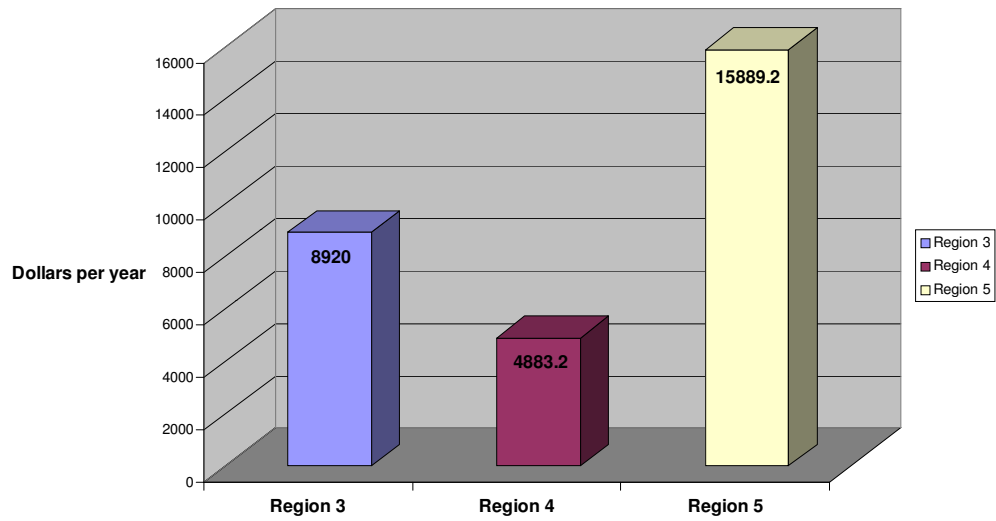


Figure 2: Estimated Cost per Acre per Year for Regions 3,4, and 5

